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Before the
Federal Communications Commission
Washington, D.C. 20554

92-235

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MAY 28 1993

FCC MAIL BRANCH
PR Docket 92-235
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In the Matter of

Replacement of Part 90 by Part 88 to)
Revise the Private Land Mobile Radio)
Services and Modify the Policies)
Governing Them)

MAY 28 1993

COMMENTS FROM THE
STATE OF ALASKA
DIVISION OF INFORMATION SERVICE
TELECOMMUNICATIONS SECTION

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

John Morrone
Deputy Director

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To: The Commission

Comments

The State of Alaska, Division of Information Services respectfully submit these comments to the Commission's Notice of Proposed Rulemaking in the above captioned proceeding.

The Division of Information Services/Telecommunications Section is responsible for the development, design, installation, and maintenance of two way radio systems for the state agencies in Alaska. Presently, our inventory shows approximately 10,000 two way radio portables, mobiles, base stations, and pagers in operation by various state agencies we serve.

Compliance with Phase I of the FCC proposal of complete conversion to the new first stage 10 KHz/12.5 KHz narrowband standards by January 1, 1996 will cause considerable hardship in terms of cost and manpower to the state. Furthermore, inquiries with various two way radio manufacturers indicate that the

conversion will entail more than just a simple adjustment of the transmitter deviation control on each two way radio. These two way radio manufacturers indicate that we will have to make conversions on the receiver as well in terms of special filtering. In some cases, we are being told that the cost of conversion on the receiver may prove to be cost prohibitive. Recommendations in some cases call for replacement of the radio unit.

We agree with the FCC position that narrowbanding must occur in order to promote more efficient use of the frequency bands below 512 MHz, and in order to evolve out of older technologies. The FCC's ultimate goal of evolving into the Phase II 5 KHz/6.25 KHz narrowband standard by January 1, 2004 appears reasonable and allows for sufficient time to evolve our systems.

We must, however, question the need to convert to the Phase I 10 KHz/12.5 KHz interim standard. Alaska does not experience the degree of channel congestion as in other parts of the country. Our limited dollars can be better spent trying to evolve our systems to the January 1, 2004 final standard with 10 years to effect the change. One recommendation is that two way radio manufacturers be encouraged to produce radios that can allow users to migrate over this period of time to the new standard without a radical replacement of the entire system.

Accordingly, we request that the Commission exempt the State of Alaska from mandatory transition to the Phase I standard.

Reduced ERP and HAAT Limits

The FCC proposal to set limits on transmitter power and antenna heights on base stations/repeaters with the goal of creating frequency reuse every 50 miles will also cause considerable hardship in terms of cost and ability to provide radio services in the state.

Alaska is a vast state in terms of land area. Many of our communication sites are on remote mountain peaks with coverage patterns well in excess of 50 miles. Since most of these sites are accessible only by helicopter, construction and operation of a site is a considerable expense. Because of the cost involved to

from the ERP/HAAT limitations.

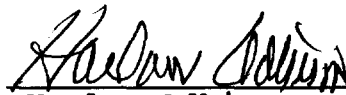
Permitting Trunked Operations

Trunked operation should be permitted in the bands affected by this proceeding. Of particular interest is the permitting of trunked operation on VHF channels. Trunking technology has not been implemented by the state as of yet because the frequencies available to date for trunking operation do not provide the necessary propagation to serve an area without the addition of more intermediate sites. This technology provides operational advantages presently not available with the existing conventional two way radio technologies. Two way radio manufacturers should be encouraged to produce such products to allow users to transition to the new narrowband standard, and take advantage of the benefits of trunked operations on VHF frequencies.

We appreciate the opportunity to comment on the FCC's proposal. We hope that the FCC will give our concerns and recommendations consideration.

Respectfully submitted,

State of Alaska
Division of Information Services
Telecommunications Section



Harlan Adkison

For: John Morrone
Deputy Director